IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

WSOU INVESTMENTS, LLC d/b/a	§
BRAZOS LICENSING AND	§ Civil Action No.: 6:20-cv-00980-ADA
DEVELOPMENT,	§ Civil Action No.: 6:20-cv-00981-ADA
	§
Plaintiff,	§
	§ JURY TRIAL DEMANDED
v.	§
CANON INC. and CANON U.S.A., INC.,	§
CANON INC. and CANON U.S.A., INC.,	§
Defendants.	§
	§ 8
CANON INC.,	8
	8
Third-Party Plaintiff,	§
	§
v.	§
	§
NXP USA, INC.,	§
	§
Third-Party Defendant.	8

DECLARATION OF JONATHAN K. WALDROP IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANT CANON U.S.A., INC.'S AND DEFENDANT CANON INC.'S MOTION FOR LEAVE TO FILE MOTION TO TRANSFER

- I, Jonathan K. Waldrop, declare as follows:
- 1. I am a Partner with the law firm of Kasowitz Benson Torres LLP and am one of the attorneys responsible for the representation of Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing And Development in this matter. I make this declaration in support of WSOU's Opposition to Defendant Canon Inc.'s and Canon U.S.A., Inc.'s Motion For Leave To File Motion To Transfer.
- 2. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

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3. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the

August 16, 2021 hearing before this Court on Canon Inc.'s Motion to Dismiss WSOU's

Amended Complaint and NXP USA, Inc.'s Motion to Dismiss Canon, Inc.'s Third-Party

Complaint.

4. Attached hereto as Exhibit 2 is a true and correct copy of Canon Inc.'s Initial

Disclosures in Civil Action No. 6:20-cv-00980-ADA, dated October 8, 2021.

5. Attached hereto as Exhibit 3 is a true and correct copy of an email chain between

counsel for WSOU and counsel for Canon, dated October 4, 2021 through October 21, 2021.

6. Attached hereto as Exhibit 4 is a true and correct copy of an email chain between

counsel for WSOU and counsel for Canon, dated October 29, 2021 through November 4, 2021.

7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the

transcript of the November 11, 2021 remote video deposition of James Smith.

I hereby declare under penalty of perjury under the laws of the United States of America

that the foregoing is true and correct to the best of my knowledge, information, and belief,

formed after reasonable inquiry under the circumstances.

Executed on the 18th day of November, 2021, in San Mateo, California.

/s/ Jonathan K. Waldrop

Jonathan K. Waldrop

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